

**SCHAERR**  
**JAFFE**  
LLP

July 25, 2024

VIA ECF

The Honorable Jessica G.L. Clarke  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: *Rapaport v. Iyer, et al.*, No. 1:23-cv-06709 (JGLC)  
Request by Consent for Extension of Time and for  
Briefing Schedule for Motion to Dismiss

Dear Judge Clarke:

Our firm was recently hired to represent Defendants Ajay Iyer and Zachary Garrett in the above-captioned case, and we write, jointly with Plaintiff, to request that the deadline for Defendants Iyer and Garrett to respond to the amended complaint be extended to August 16, 2024. Absent extension, Defendants' response to the amended complaint is currently due by July 29, 2024. Additionally, the parties request that the Court enter the following briefing schedule for the motion to dismiss that Defendants Iyer and Garrett anticipate filing:

- Defendants' Motion to Dismiss due on August 16, 2024
- Plaintiff's Opposition due on September 16, 2024
- Defendants' Reply due on September 30, 2024

The parties have not requested any previous extensions, and there are no scheduled appearances in this matter. Given Plaintiff's First Amended Complaint, with its revised allegations, and the recent hiring of our firm to represent Defendants Iyer and Garrett, Plaintiff and Defendants Iyer and Garrett request this Court allow the parties to follow the above briefing schedule, which is less than a 30-day extension of the previous deadlines. The parties therefore respectfully request the Court "So Order" the negotiated terms reflected in this letter.

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cc: All counsel (via ECF)

Respectfully,

/s/ Brian J. Field

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